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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MAYRA AGUIRRE-ORTIZ, individually,

CASE NO.: 2:20-cv-00009-RFB-BNW

12 Plaintiff,

13 vs.

14 **STIPULATION FOR EXTENSTION OF**
DISCOVERY DEADLINES (FOURTH
REQUEST)

15 SMITH'S FOOD AND DRUG STORE a/k/a
16 KROGER and DOES I-V, and ROE
CORPORATIONS, I-V, inclusive,

17 Defendants.

18 The above named parties submit the following Stipulation for Extension of Discovery
19 Deadlines (Fourth Request).

21 **A. DISCOVERY COMPLETED TO DATE**

22 This matter involves a slip and fall at one of defendant's local store branch locations.
23 On January 23, 2020, the parties held an initial Rule 26(f) Conference. February 10, 2020, the
24 Court entered a stipulated discovery plan and scheduling order. Plaintiff and Defendants have
25 served their initial disclosure of witnesses and documents. Defendant has propounded a written
26 discovery upon Plaintiff. Defendant has deposed Plaintiff. Plaintiff is in the process of deposing
27 Defendant.



1 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

2 Defendant needs to take the deposition of Plaintiff's expert witness. Plaintiff needs to
3 disclose additional medical records.

5 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

6 The state of emergency and resulting Court orders regarding COVID-19 have impacted
7 the parties' ability to conduct discovery. Specifically, due to truncated office hours, the parties
8 need additional time to collect additional medical records. The parties did not request the instant
9 extension of the discovery deadlines sooner than twenty-one days before the current discovery
10 deadline as the parties did not realize until after that time that they would not be able to complete
11 sufficient factual discovery to allow their experts to adequately prepare their reports prior to the
12 current disclosure deadline. Additionally, the parties have agreed to submit the case to private
13 mediation, currently scheduled for May 13th, 2021, and will promptly inform the Court of any
14 resolution that may result.

15 Accordingly, the parties request that the Court extend the current discovery deadlines
16 ninety days.

17 **D. PROPOSED DISCOVERY SCHEDULE**

18 Close of Discovery: June 21, 2021.

19 Dispositive Motions: July 19, 2021.

20 Joint Pre-Trial Order: August 18, 2021.

21 Last day to amend pleadings: Closed.

22 Initial Expert Disclosures: Closed.

23 Rebuttal Expert Disclosures: Closed.

24 Interim Status Report Closed.

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1 DATED this 29 day of March, 2021.
2 **RICHARD HARRIS LAW FIRM**

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6 MICHAEL I. SANDOVAL, ESQ.
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10 *Attorneys for Plaintiff*

DATED this 29 day of March, 2021.
COOPER LEVISON, P.A.

/s/ Andre Marques

ANDRE T. MARQUES ESQ.
Nevada Bar No. 14737
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11 *Attorneys for Defendant*

12 **ORDER**

13 IT IS ORDERED that the parties' stipulation is GRANTED. However, the Court
14 instructs the parties that it is not inclined to grant additional extensions absent
exceptional circumstances establishing good cause.

15 **IT IS SO ORDERED**

16 **DATED:** 2:03 pm, April 02, 2021

17 
18 **BRENDA WEKSLER**
19 **UNITED STATES MAGISTRATE JUDGE**

20 RICHARD HARRIS
21 LAW FIRM
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